UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: 19 OCT 1983

SUBJECT: Response to Air Portion of the Remedial Investigation of the Granite City Site of NL Industries, Illinois

FROM: Steve Rothblatt, Chief
Air and Radiation Branch

TO: Mary Gade, Acting Chief
Emergency and Remedial Response Branch
Waste Management Division

Attached are our comments on the Remedial Investigation of the Granite City Site of NL Industries, Illinois.

If you have any questions regarding our comments, please feel free to contact Debbie Arenberg at 353-2654, if there are radiation issues, or Mardi Klevs at 886-6054 if there are air issues.

Attachment

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: 14 OCT 1988

SUBJECT: Review of the Air Portion of the Remedial Investigation of the Granite City Site of NL Industries, Granite City, Illinois

FROM: Mardi Klevs, Environmental Engineer Mardi Klevs
Technial Analysis Section

TO: Fayette Wrightsell, Docket Clerk
Regulatory Analysis Section

THRU: Carl Nash, Chief Carl Nash
Ambient Assessment Unit, Technical Analysis Section

Joseph Paisie, Chief Joseph W. Paisie
Technical Analysis Section

Please transmit the following comments to the Office of Superfund.

I have no major criticisms of the air portion of the Remedial Investigation (RI) for the Granite City Site of NL Industries in Granite City, Illinois. However, it should be brought to the attention of Brad Bradley, the Remedial Project Manager, that two assumptions used in the risk assessment for air inhalation are questionable.

It is usually assumed that 10 percent of the chromium particulate fraction is in the hexavalent form unless there is a reason to believe otherwise. The contractor need not have used the more conservative estimate of 100 percent. The latest inhalation cancer potency number listed in the Intergrated Risk Information System for arsenic (inorganic) is 50 $(mg/kg/day)^{-1}$. I believe the 1.5 $(mg/kg/day)^{-1}$ used in the RI is based on information in the Superfund Public Health Evaluation Manual. Current U.S. Environmental Protection policy, as detailed in a memorandum entitled "Integrated Risk Information System (IRIS)", signed by Lee Thomas, calls for all USEPA program office staff to use the information in IRIS when available. Therefore, I suggest that the 50 $(mg/kg/day)^{-1}$ by substituted into the risk assessment.

It is unclear whether the source of the high risk metal concentrations are due to hazardous waste generated on site or to other industrial sites in the area. I am assuming that any remedial technology selected for lead will also alleviate any metal contamination stemming from the site.

If Brad has any questions, he may contact me at 886-6054.